

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

ASHLEY DIAMOND,)	
)	
Plaintiff,)	
)	
v.)	Civ. Action No. 5:15-cv-00050 (MTT)
)	
BRIAN OWENS, et al.,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME FOR
BRIEFING ON PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

COME NOW plaintiff Ashley Diamond ("Plaintiff"), by and through counsel, and defendants Brian Owens, Sharon Lewis, Shay Hatcher, Ruthie Shelton, and Marty Allen, by and through counsel the Attorney General for the State of Georgia, and defendants David McCracken, John Thompson, and Donna Silver, by and through counsel Insley & Race, LLC (collectively "Defendants"), to file this Consent Motion for Extension of Time For Briefings on Plaintiff's Motion for Preliminary Injunction, and state as follows:

On February 19, 2015, Plaintiff commenced this action (Doc. 3), and on February 20, 2015, Plaintiff filed a Motion for Preliminary Injunction (the "Motion") (Docs. 1, 2). On April 10, 2015, Defendants filed Oppositions to Plaintiff's Motion (Docs. 36, 37), and on April 21, 2015, Plaintiff filed an Unopposed Motion to Stay Proceedings on the Motion until May 25, 2015 in order to monitor developments with respect to Plaintiff's medical care (Doc. 45). With the consent of Defendants, Plaintiff now seeks leave of the Court to extend the deadline for further briefing with respect to Plaintiff's Motion by two months, until **July 27, 2015**. Such extension is requested and has been consented to in order to allow Plaintiff's counsel the opportunity to assess the care Plaintiff is receiving at her new facility, Rutledge State Prison, and to

permit additional consultation between the parties about the issues raised in Plaintiff's Motion.

A proposed order will be provided for the Court's consideration.

Dated: May 20, 2015

Respectfully submitted,

/s/ A. Chinyere Ezie

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Consented to by:

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed a **CONSENT MOTION FOR EXTENSION OF TIME FOR BRIEFING ON PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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